

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

TRAVIS JARED PARK, pro se

v.

Civil Action No. 1:19-cv-991-LM

SCOTT BAILEY (in his official capacity as
a Special Agent of the FBI),
CHRISTOPHER WAGNER (in his official
capacity as head of the State of New
Hampshire Police), and
STEVEN RUSSO (in his official capacity as
head of the City of Keene Police)

**DEFENDANT CHRISTOPHER WAGNER'S MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE TO COMPLAINT TO NOVEMBER 12, 2019**

Pursuant to Local Rule 7.2, Defendant Colonel Christopher Wagner, in his official capacity as Director of the New Hampshire State Police, by and through his counsel, the Office of the Attorney General, respectfully submits this motion for extension of time to respond to the Complaint, and in support thereof states as follows:

1. Undersigned counsel received a copy of the Complaint on October 18, 2019, and was under the impression that it had been served on the New Hampshire State Police on or about that date. As such, undersigned counsel believed that a response pursuant to Fed. R. Civ. P. 12(a)(1)(A) was November 8, 2019.

2. The Plaintiff's Returns of Service were posted on November 5, 2019, where it was discovered that the Court has entered a service date of October 14, 2019 and as a result has indicated that the Fed. R. Civ. P. 12(a)(1)(A) response deadline was November 4, 2019.

3. The Defendant seeks an extension of time to file its response to the Complaint to November 12, 2019.

4. Undersigned counsel attempted to contact the Plaintiff by phone on the morning of November 5, 2019 to request assent to the relief requested in this motion, but as of the time of this filing, Plaintiff has not responded.

5. The requested extension would not result in the continuance of any hearing, conference, or trial.

6. Pursuant to Local Rule 7.1.(a)(2), no memorandum of law is attached because all of the legal citations are set forth herein.

WHEREFORE, Defendant Wagner and the New Hampshire State Police respectfully request that the Court order as follows:

- A. Grant Defendant's Motion for Extension of Time to File Answer to Complaint to November 12, 2019; and
- B. Grant such other and further relief as is just and necessary.

Respectfully submitted,

CHRISTOPHER WAGNER (in his official capacity as head of the State of New Hampshire Police)

By his Attorneys,

GORDON J. MACDONALD
ATTORNEY GENERAL

November 5, 2019

/s/Allison B. Greenstein

Allison B. Greenstein, Bar. No. 265364
Assistant Attorney General
New Hampshire Attorney General's Office
33 Capitol Street
Concord, New Hampshire 03301-6397
(603) 271-3675
allison.greenstein@doj.nh.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 2019, a copy of the above Motion was served via ECF on all counsel of record and was delivered conventionally to:

Travis Jared Park
13918 E Mississippi Ave #152
Aurora, CO 80012

/s/Allison B. Greenstein

Allison B. Greenstein